

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS	:	
ANTITRUST LITIGATION	:	Master File No. 12-md-02311
	:	Hon. Marianne O. Battani
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THIS DOCUMENT RELATES TO:	:	
	:	
ALL CASES	:	
	:	

**JOINT SUPPLEMENT TO PLAINTIFFS' POSITION PAPER AND THE REPLY OF
THE UNITED STATES TO THE UNITED STATES' MOTION TO INTERVENE AND
FOR A TEMPORARY AND LIMITED STAY OF CERTAIN DISCOVERY**

After further discussions, Plaintiffs and the Antitrust Division of the Department of Justice (“DOJ”) have reached a compromise on the language in the proposed stipulation relating to Plaintiffs’ reservation of rights to request, from any individual or entity, but not DOJ, discovery of statements made by Defendants to DOJ during the course of DOJ’s auto parts investigation.

Pursuant to this agreement, the language in “Plaintiffs’ Position” on p.5 of the joint version of the proposed order (Doc. No. 602-2) under “All Initial and Later Cases,” is modified as follows (the modification set forth in italics):

[PLAINTIFFS’ POSITION: Once any stay is lifted, any party may request that the Court permit it to discover from any individual or entity, but not the DOJ, statements made by any individual or entity to the DOJ, subject to the rights of DOJ and any other party to object to such request. *DOJ has indicated to Plaintiffs that, depending on the specific request made, if any, it likely will object to any attempt to discover from Defendants’ files statements made to DOJ during the course of its auto parts investigation. Any objection made by DOJ will ultimately be resolved by this Court if it cannot be resolved by the parties.*]

As modified, DOJ does not oppose inclusion of this language in the Proposed Stipulation. As a result of this modification, DOJ and Plaintiffs have no remaining disputes relating to the discovery stipulation.

Dated: November 4, 2013

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CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2013, I electronically filed the foregoing paper with the Clerk of the court using the ECF system which will send notification of such filing to all counsel of record registered for electronic filing.

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